

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PLAMAR NAVIGATION LTD.,

Plaintiff,

-against-

TIANJIN SHENGJIA SHIPPING CO., LTD. a/k/a SHENGJIA (HONG KONG) SHIPPING AND TRADING CO., LTD., CHANGSHU NEW CHANGGANG TRADE CO. LTD., HANGZHOU HEAVY STEEL PIPE CO. LTD., HENGYANG STEEL TUBE GROUP INT'L TRADING INC., HUBEI XIN YEGANG CO., LTD. a/k/a HUBEI XIN YEGANG STEEL CO. LTD., JIANGSU CHANGSHU MARINE SHIPPING AGENCY CO. LTD., JIANGSU LIHUI IRON AND STEEL CO., LTD., JIANGSU PROS.A INT'L CO. LTD., JIANGYIN XINGCHENG SPECIAL STEEL WORKS CO., LTD., KUGLER HAAS, LALANI STEEL INC., FASTEN BLOC SHANGHAI IMP. AND EXP. CO., LTD., FASTEN GROUP IMP. AND EXP. CO. LTD., SUZHOU HUASHENG IMP. AND EXP. CO., LTD., SUZHOU SEAMLESS STEEL TUBE WORKS, VICTORY LOGISTICS INT'L CO., LTD., WUXI DINGYUAN PRECISION COLD DRAWN STEEL PIPE CO. LTD., WUXI TIAN LIANG FOREIGN TRADE CO. LTD., XIGANG SEAMLESS STEEL TUBE CO. LTD., XINYU IRON AND STEEL CORP. LTD., YANGZHOU LONGCHUAN STEEL TUBE CO., LTD., YIEH CORPORATION LTD. and YIZHENG HAITIAN ALUMINUM INDUSTRIAL CO., LTD.,

Defendants.

**NOTICE OF MOTION TO VACATE RULE B ATTACHMENT
PURSUANT TO SUPPLEMENTAL ADMIRALTY RULE E(4)**

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Attorneys for Defendants Changshu New Changgang Trade Co. Ltd., Hengyang Steel Tube Group Int'l Trading Inc., Hubei Xin Yegang Co., Ltd., Jiangyin Xingcheng Special Steel Works Co., Ltd., Fasten Bloc Shanghai Imp. And Exp. Co., Ltd., Fasten Group Imp. and Exp. Co. Ltd., Suzhou Seamless Steel Tube Works, Xigang Seamless Steel Tube Co. Ltd., Wuxi Tian Liang Foreign Trade Co. Ltd., and Yieh Corporation Ltd..

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law; the Declarations of: Deng Gang dated September 8, 2009, Jiang Yunhu dated September 8, 2009, Li Yu dated September 8, 2009, Peng Wei dated September 8, 2009, Qu Ke dated September 9, 2009, Shi Xiaodong dated September 8, 2009, Sun Jiabin dated September 8, 2009, Xu Qiusong dated September 7, 2009, Zhou Yuhua dated September 8, 2009, Tang Yinqiu dated September 9, 2009, Yang Guoxian dated September 8, 2009, Lu Xujie dated September 9, 2009, Zheng Fengyong dated September 8, 2009, Wang Jian dated September 10, 2009, and Huang Tao dated September 10, 2009; and Carl W. Oberdier September 10, 2009; the accompanying exhibits; and the pleadings herein, defendants Changshu New Changgang Trade Co. Ltd., Hengyang Steel Tube Group Int'l Trading Inc., Hubei Xin Yegang Co., Ltd., Jiangyin Xingcheng Special Steel Works Co., Ltd. ("Xingcheng"), Fasten Bloc Shanghai Imp. and Exp. Co. Ltd., Fasten Group Imp. and Exp. Co. Ltd., Suzhou Seamless Steel Tube Works, Xigang Seamless Steel Tube Co. Ltd., Wuxi Tian Liang Foreign Trade Co. Ltd., and Yieh Corporation Ltd. ("Defendants"), making a restricted appearance under Supplemental Admiralty Rule E(8), will move, pursuant to Supplemental Admiralty Rule E(4) and Local Rule E.1, for an order vacating the attachment issued against the Defendants and for all such other relief to which the Defendants may be entitled on the grounds that Plaintiff Plamar Navigation, Ltd. has failed to state a valid prima facie maritime claim against the Defendants as required by Supplemental Admiralty Rule B and that Defendant Xingcheng can be found in the district.

PLEASE TAKE FURTHER NOTICE, that pursuant to the briefing schedule agreed to by counsel for the Plaintiff and counsel for the Defendants, Plaintiff's opposition papers must be filed and served by noon on Wednesday, September 16, 2009 and Defendants' reply papers must be filed and served on Friday, September 18, 2009.

PLEASE TAKE FURTHER NOTICE, that, pursuant to Supplemental Rule E(4)(f) and Local Rule E.1, Defendants respectfully request a prompt hearing on their Motion on September 22, 2009, or as soon thereafter as the Court shall order.

Dated: New York, New York
September 10, 2009

Respectfully submitted,

SCHIFF HARDIN LLP

By: /s/ Carl W. Oberdier
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